

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
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Federal-State Joint Board)
on Universal Service)
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

CC Docket No. 96-45

To the Joint Board:

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JOINT COMMENTS OF
EDUCATION AND LIBRARY NETWORK COALITION

Summary

The Education and Library Network Coalition ("EDLINC"), a coalition of groups representing public and private schools and libraries, urges the Joint Board and the Commission to establish a standard of service and a discount methodology for schools and libraries that will fulfill the intent of Congress by delivering the full benefit of advanced telecommunications to schools and libraries everywhere in the country at affordable prices.

Current rates for the telecommunications services that schools and libraries need to obtain access to telecommunications services are extremely high in proportion to school and library budgets. The fairest and most effective way to ensure affordable rates for schools and libraries is to establish a national competitive benchmark rate as the basis for a discounted price. This ensures that rates are not computed on an artificially high base and gives all users the benefit of a competitive market rate, even in areas where there is no competition.

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All services or functionalities should be eligible for discounts. The FCC is not equipped to decide what services or functionalities best suit the needs of each school or library in the country. The simplest and fairest approach is to make every service and functionality that is commercially available anywhere in the country available at a discount.

Section 254(h) contemplates that internal connections to classrooms are eligible for universal service support, because it must be read in conjunction with Section 254(c)(3), which states that universal service support is to be available "for the purposes of subsection (h)." The legislative history of Section 254(h) plainly states that one purpose of subsection (h) as a whole is to ensure that classrooms have access to modern telecommunications services and advanced telecommunications services.

Congress did not intend the Commission to use Section 706 to replace Section 254(h) to provide discounted affordable access to switched broadband technology or connections to classrooms within its definition of special services. Section 708 also should not be relied on as a means of supporting universal service or of funding advanced services.

EDLINC's proposal, which would allow any telecommunications service provider to respond to requests for proposals from schools and libraries, would promote competition. An effective subsidy mechanism that ensures that schools and libraries have the ability to sustain their use of telecommunications services over the long term

will entice new providers into what could become an enormous new market niche. A bid mechanism will also encourage the participation of the lowest cost providers.

The resale prohibition of Section 254(h)(3) should be construed as narrowly as possible to encourage the growth of new networks and aggregation of purchasing power. The Commission should permit end-user cost-based fees for services and should prohibit only resale of services to the public for profit.

Encouraging the growth of community-based consortia is a highly effective means of ensuring that schools and libraries have access to affordable telecommunications services. Therefore, discounts should be available to such consortia as a whole so long as they are not clearly and directly violating the prohibition on resale to the public for profit.

Congress did not authorize a block grant program, a voucher program, or direct billing credits. The 1996 Act allows only for actual discounts on rates for services used by schools and libraries. Any other method would not ensure affordability and would not constitute universal service.

The Commission should not impose any administrative requirements on requests for service. Schools and libraries already comply with procurement procedures designed to ensure that public funds are not spent without proper authorization. If a service provider has doubts about an institution's status or accreditation, it can inquire at the state board of education or a similar agency, but there should be a presumption that any institution requesting service is authorized to obtain it.

The discounted rates for schools and libraries should be based on national competitive benchmark prices. The benchmark prices could be based on rates paid by schools and libraries in areas in which there is market competition; on the lowest commercially-available rate; or on the total service long-run incremental cost.

The discount itself should be calculated by ranking each school district in a state using a combination of factors designed to ensure affordability. The discount available to a school district would vary from 30% to 70%, and would be proportional to the school's final ranking after all the factors have been considered.

Any current discounts that happen to be lower than the discounts calculated under the above method should remain in place. Those discounts are presumptively reasonable or they would not have been available in the first place. It would be ironic if the adoption of regulations intended to ensure affordable access to telecommunications would cause a user's rates for those services to increase.

Attached as Table B is information regarding current state discount programs.

In addition to the discount described above, certain schools and libraries may find that they require additional discounts. State PUC's should have the authority to establish such additional discounts, if a school can demonstrate that its telecommunications costs exceed 1% of its total revenues. Currently, schools spend about 1.3% of their budgets on technology, including telecommunications, so a school that is spending more than 1% is probably spending substantially more than average. The appropriate percentage for libraries may be different. Service providers would receive additional reimbursements for such supplemental discounts; the state

universal service mechanism would contribute one-third of that amount, and the federal mechanism would contribute two-thirds.

No existing model is needed to determine whether a school or library should receive a supplemental discount. If the percentage of revenue test is met, that should be sufficient.

The supplemental discounts could be made available under either a sliding scale or step approach.

Separate funding mechanisms are not needed for schools, libraries and rural health care providers. The law does not contemplate separate mechanisms. The only thing that matters is that total contributions are sufficient to meet total obligations.

EDLINC does not believe it is practical for the industry to develop a final model within the timeline required by the 1996 Act, and any attempt to do so would lead to unnecessary delay.

The Commission should adopt different proxy models for core services and services to schools and libraries. The Joint Board currently has ample information regarding the costs of providing services to schools and libraries, but attempting to fit the full range of special services into a proxy model designed to address core services would lead to distortion and inaccuracies. Therefore, the two areas should be kept separate, at least until the network for special services has been built out.

Finally, the Joint Board should urge the Commission to fully implement the intent of the 1996 Act by giving schools and libraries access to the broadest possible range of services at affordable prices.

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To the Joint Board:

Introduction

The Education and Library Network Coalition ("EDLINC") is a coalition of groups representing public and private schools and libraries, whose members are identified at Exhibit A. This coalition filed comments and reply comments in response to the Notice of Proposed Rulemaking and Order Establishing the Joint Board (the "NPRM") under the name of National School Boards Association et al., and hereby submits answers to some of the questions put by the Joint Board in its Public Notice released July 3, 1996. We again urge the Commission to establish a standard of service to schools and libraries that will provide the full benefit of advanced telecommunications at the most affordable price.

Definitions Issues

1. Is it appropriate to assume that current rates for services included within the definition of universal service are affordable, despite variations among companies and service areas?

Answer: Current rates for the telecommunications services schools and libraries need to provide educational opportunities for students and library patrons are not affordable, for two reasons. First, the vast majority of school districts and libraries currently pay commercial rates for services. Second, schools and libraries operate under extremely tight budgets.

If services were currently affordable for schools and libraries, the growing demand for technology in the classroom would have led more schools and libraries to obtain those services. As recent studies show, however, schools and libraries currently do not have the levels of technology needed to provide students and library patrons with the training and opportunities they need:

- Only 9% of classrooms have access to the Internet for instructional purposes. The lack of funding has been cited as one of the biggest barriers to acquiring more telecommunications services.¹ For private schools, 61% cited lack of funds as a major barrier.²

¹ U.S. Department of Education, National Center for Education Statistics, Advanced Telecommunications in U.S. Public Elementary and Secondary Schools, 1995, Feb. 1996.

² U.S. Department of Education, National Center for Education Statistics, Fast Response Survey System, "Survey on Advanced Telecommunications in U.S. Private Schools, K-12."

- Only 12% of classrooms have telephones.³
- Only 1.4% of schools have higher speed connections useful for such applications as distance learning.⁴
- Only 23.3% of public libraries are able to offer direct access to the World Wide Web.⁵
- Only 4% of private schools class rooms have Internet access, and only 3% have ISDN or equivalent high speed capability.

Even in states where schools and libraries have been provided with temporary discounts or installation breaks through public and private initiatives, services often remain unaffordable over the long term. In North Carolina, for example, several major telecommunications companies are providing a fiber backbone for the North Carolina Information Highway. Currently, however, only 52 out of over 300 high schools are accessing the NCIH because of the high monthly charges and, of those 52, many are finding it difficult to remain on the system for the same reason. The current rates for telecommunications services do not address the long-term affordability needs of schools and libraries.

Other school districts and libraries are simply running up against commercial rates that are unaffordable. In addition, many schools and libraries,

³ U.S. Department of Education, National Center for Education Statistics, Advanced Telecommunications in U.S. Public Elementary and Secondary Schools, 1995, Feb. 1996.

⁴ Id.

⁵ PLA/PLDS, Technology in Public Libraries 1995 Survey, Statistical Report 1995 Public Library Data Services (1995).

particularly those in rural areas, currently pay high toll charges for access to the Internet. The following examples demonstrate the range of pricing and affordability situations that schools and libraries are facing across the country.

1. The Chittenden South School District in Hinesburg, VT, a rural district with four K-8 schools and one high school totaling 4,000 students, needs to upgrade their school district wide network. The network currently has 1,200 computers on line for students served by a T-1 line and several 56k lines. The cost of the T-1 line is \$13,000 per year. The cost of a 56 Kbs line is \$400 per month/per school. They have been unable to purchase needed additional T-1 lines because of the exorbitant annual cost. The provider company has indicated that they are prohibited from negotiating a more affordable rates for the district. Chittenden will be unable to keep pace with the growing demand on their network unless that cost is reduced.

2. The San Francisco Unified School District has 110 schools. 55 of those schools are connected via a T-1 line. T-1 lines are running \$10,000 per year. Internet access is \$300,000 per year and the total annual costs for dial-tone throughout the district is \$2,000,000. The Oakland United School District also spends \$2 million per year on telephone bill expanses.

3. In Nebraska, most school districts have negotiated 56Kbs rate that average \$125/site/month. However, several towns in Nebraska including Kearney and Neligh have been unable to obtain an affordable rate and face monthly charges of \$350/site. In addition, many local rural schools are relying on local

dial up lines to connect with the 56Kbs hubs. They need to obtain additional phone lines for this purpose but most must pay high business rates of \$45-60/line/month.

4. Cost of connection was listed as the most important factor affecting public library involvement with the Internet in a 1994 National Commission on Libraries and Information Science report, Public Libraries and the Internet (June 1994, Figure 5). In March of this year, a public librarian in Bristol, Virginia, reported that their connection is a 56 Kb line, which is slow when using the World Wide Web. The cost for this service is \$9200 for access to the Virginia Library Information Network ("VLIN") and an additional \$1200 for individual VLIN user accounts. The library would prefer to use a much faster (T1) connection, if the price were lower.⁶

5. According to the National Center for Education Statistics about 40% of public libraries had annual operating expenditures of less than \$50,000. 54% of public libraries had annual operating expenditures of less than \$100,000. Only 9.6% of public libraries had annual operating expenditures of \$1,000,000 or more. Using numbers from the Digest of Education Statistics, 1995, over 52% of public libraries are in non-metropolitan areas. This illustrates that most libraries would be hard-pressed to pay current tariffed rates for

⁶ Bill Muller, Bristol Public Library, Re: Universal Service Info, bmuller@leo.vsla.edu, March 25, 1996.

telecommunications services. A \$10,000 T-1 line would represent over 10% of the budget of most libraries in the country.

Schools and libraries are also confronting an extreme budget crunch. School and library budgets are essentially in a no-growth pattern while they are facing increasing costs on several fronts. By the year 2006, K-12 school enrollment is expected to grow more than 10% from 1994 levels. Schools also face an increasing number of at-risk children that have historically incurred greater education costs. In addition, the share of K-12 education spending in state budgets had been on a downward path, decreasing by 11% between 1987 and 1994 as states struggle to pay for increases in Medicaid and corrections.⁷ Federal education resources are shrinking or frozen for the foreseeable future and an increasing number of states are limiting the ability of local school districts to tax.⁸

With the demonstrated fiscal pressures on schools and libraries, cost shifting within school and library budgets will not be able to cover new costs of telecommunications services. In addition, within lean school budgets, only 9.7% of funding goes to general and school administration.⁹ These budgetary realities

⁷ United States General Accounting Office, School Finance: Trends in U.S. Education Spending, GAO/HEHS-95-235 (Sept. 1995).

⁸ Center for the Study of the States "Public School Finance Programs of the United States and Canada," 1993-94 (1995).

⁹ Economic Policy Institute report "Where Has All the Money Gone?," Richard Rothstein and Karen Hawley Miles (1996).

make it even more apparent that current rates for services for schools and libraries are and will remain, unaffordable.

2. To what extent should non-rate factors, such as subscribership level, telephone expenditures as a percentage of income, cost of living, or local calling area size be considered in determining the affordability and reasonable comparability of rates?

Answer: As further discussed below in our answer to Questions 16 and 20, non-rate factors must be considered in determining the affordability of rates. Population density, household income and the percentage of revenues devoted to telecommunications costs are all factors that affect the affordability of telecommunications services, and should be taken into account in comparing and setting rates.

3. When making the "affordability" determination required by Section 254(i) of the Act, what are the advantages and disadvantages of using a specific national benchmark rate for core services in a proxy model?

Answer: Although this question is directed at core services, we would like to address the advantages of a national benchmark rate for special services for schools and libraries, as well. The advantage of a national benchmark rate is that it can be based on rates in competitive markets, which are presumably the lowest rates possible, assuming there are no market distortions or other anomalies at work.

This ensures that rates will not be computed from an artificially high base, which could give the appearance of providing a substantial discount, while not actually assuring affordability for many users. Thus, by establishing a relatively low rate as the basis for further reduction, a national benchmark helps ensure that the final discounted rate is as low as possible.

Use of a national benchmark also puts downward pressure on rates in areas that may be above the benchmark, since it will be in the service provider's interest to avoid a situation in which the universal service fund does not fully reimburse its costs. Over the long run, this downward pressure can lead to further reduction in the benchmark rate itself, thus further lowering discounted rates and increasing affordability. For a more complete discussion of this issue in the context of schools and libraries, see our answer to Question 16.

Schools, Libraries, Health Care Providers

6. Should the services or functionalities eligible for discounts be specifically limited and identified, or should the discount apply to all available services?

Answer: All services or functionalities should be eligible for discounts. The FCC is ill-equipped to distinguish which services or functionalities should be discounted for each of the nation's schools and libraries. The telecommunications needs of a tiny, remote Texas school district which must pool resources with equally tiny,

remote districts and community colleges to provide any advanced courses will differ significantly from a suburban school steeped in advanced technology, which provides research data and analysis to the Department of Energy. Likewise, the telecommunications needs of an Alaskan village school which cannot be reached by road will differ significantly from those of a crumbling inner-city school filled with asbestos. And the telecommunications needs of schools serving challenged populations may differ from all of the above. Similarly, libraries serve diverse communities and will not all want or need the same services.

Having a range of services available at different prices will ensure that schools and libraries make decisions based upon their needs and the economic implications of those decisions. If schools and libraries are forced to choose among a few services available at a discount, no matter whether or not they are appropriate for their circumstances, resources may be misspent and neither the institutions nor their clients will reap the benefits of the telecommunications revolution.

We also urge the Commission to consider adopting an approach in which unbundled network elements would be eligible for discounts. This would encourage the development of a truly functionality-based mechanism, in which schools and libraries could determine the functionalities they need and prepare requests for proposals based on those functionalities, which a variety of service providers could bid on, either singly or in consortia.

In short, if a service or functionality is commercially available anywhere in the country, it should be discounted. Schools and libraries on the cutting edge blaze a trail for those who are not as advanced, but others seek desperately to catch up only to face rates that are unaffordable. Given the rate of technological evolution, a list of defined services or functionalities to be discounted would likely include outdated services before it could even be widely distributed and it would take too much time and deliberation to keep the list current.

7. Does Section 254(h) contemplate that inside wiring or other internal connections to classrooms may be eligible for universal service support of telecommunications services provided to schools and libraries? If so, what is the estimated cost of the inside wiring and other internal connections?

Answer: Section 254(h) does contemplate that internal connections to classrooms will be eligible for universal service support. Section 254(h) must be read in conjunction with Section 254(c)(3), which states that "the Commission may designate additional services . . . for schools, libraries and health care providers for the purposes of subsection (h)." Thus, the Commission has broad authority to determine what services constitute "special services" under Section 254(c), and in defining those services, the Commission is to consider the purposes of Section 254(h). To determine the purposes of Section 254(h) with respect to schools and

libraries, we must examine both Section 254(h)(1)(B) and Section 254(h)(2), and the legislative history.

Section 254(h)(1)(B) provides that universal service support is to be available for all services falling "within the definition of universal service under subsection (c)(3)" -- that is, all "special services." Section 254(h)(2) directs the Commission to adopt additional regulatory measures, outside the universal service mechanism of Section 254(h)(1)(B), to enhance access to advanced telecommunications for all classrooms, health care providers and libraries. Thus, Section 254(h) taken as a whole has the general purpose of advancing access to advanced telecommunications for schools and libraries, including classrooms. In addition, the Conference Report on the Telecommunications Act of 1996 states that:

New subsection (h) . . . is intended to ensure that . . . elementary and secondary school classrooms, and libraries have access to modern telecommunications services that will enable them to provide media and educational services to all parts of the nation.

The ability of K-12 classrooms, libraries and rural health care providers to obtain access to advanced telecommunications services is critical to ensuring that these services are available on a universal basis.

Thus, the Conference Report states plainly that providing connections to classrooms is part of the purpose of Section 254(h). Therefore, the Commission has the authority to include inside wiring in its definition of special services under Section 254(c)(3).

In addition, we wish to emphasize that the use of the term "advanced services" in Section 254(h)(2) does not mean that a so-called advance service

cannot also be a "special service" under Section 254(c)(3). Section 254(h)(2) directs the Commission to adopt regulatory measures that will "enhance . . . access" to advanced services. Presumably, the term "advanced services" was used to include new services that have not yet been developed. Those new advanced services may later be incorporated into the definition of special services, since those services would be within the "purposes of subsection (h)" required for designation as a special service. Thus, the Commission is to promote the growth of new services as well as ensure access to existing services.

Finally, the Conference Report not only supports our view that Section 254(h)(2) is directed at regulatory measures to promote advanced services, but indicates that advanced services may be included among the services eligible for universal service support:

New subsection (h)(2) requires the Commission to establish rules to enhance the availability of advanced telecommunications and information services to public institutional telecommunications users. For example, the Commission could determine that telecommunications and information services that constitute universal service for classrooms and libraries shall include dedicated data links and the ability to obtain access to education materials, research information, statistics, information on Government services, reports developed by Federal state and local governments, and information services which can be carried over the Internet.

Here Congress discusses data links to classrooms -- inside wiring -- in the context of advanced services, and plainly states that such links may fall under the definitions of both advanced services and universal service -- that is, special services under Section 254(c)(3).

Therefore, there can be no doubt that Congress intended that the Commission include connections to classrooms in the new universal service mechanism established by Section 254(h).

The only current figures we have regarding the cost of connecting classrooms are derived from the KickStart Report. KickStart indicates that initial deployment of connections within schools could cost up to \$6.11 billion, with annual operation and maintenance costs of \$0.56 billion thereafter. We are currently attempting to gather additional information regarding those costs, and will provide it when it is available.

8. To what extent should the provisions of Sections 706 and 708 be considered by the Joint Board and be relied upon to provide advanced services to schools, libraries and health care providers?

Answer: Section 706 of the 1996 Act directs the Commission and the states to "encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans," including schools and classrooms. "Advanced telecommunications capability" is defined to mean, essentially, switched broadband technology, as proposed in our Comments at p. 14. Section 706 thus lends further support for the proposal put forth in our Comments and our answer to Question 7, above. Congress intends for the Commission and the states to provide switched broadband technology to every classroom in the country, and

has given the Commission broad authority and flexibility in choosing the means by which that goal is achieved. Nothing in Section 706 is inconsistent with the notion that the Commission should include connections to classrooms or switched broadband technology in its definition of special services under Section 254. Furthermore, since providing those capabilities is clearly a Congressional goal, the Commission should use universal service as a mechanism for meeting that goal, so long as it is in a manner that is consistent with the public interest, convenience and necessity. In any case, Congress did not intend for Section 706 to replace the use of 245(h) to provide discounted, affordable access to switched broadband technology or connections to classrooms within its definition of special services.

Section 708 allows the National Education Technology Funding Corporation (the "NETFC") to receive federal funds for the purpose of stimulating private investment in educational networks and technology infrastructure and providing loans and grants to aid the development of such networks and infrastructure. This section should be relied upon by the Commission to complement the provisions of Section 254(h) and 254(c), not to replace or supersede them. For example, Sections 254(c)(3) and 254(h) provide for the provision of universal service support to schools and libraries, but that support is limited to connections to classrooms and schools and libraries. Universal service support does not include computing equipment, software, training and other areas that must be addressed if the new networks to be

developed under Section 254 are to be truly useful. Section 708 offers a means for providing such technology, and the Corporation should use its funds to provide those additional types of services and equipment. On the other hand, Section 708 does not refer to "advanced services," and by its terms includes the whole field of educational technology. Thus, Section 708 should not be relied on as a means of supporting the universal service fund or of funding advanced services. Finally, the NETFC does not currently have any funds that could be used to implement the goals of Section 254(h), and implementation should not be delayed until the NETFC does have funding.

9. How can universal service support for schools, libraries, and health care providers be structured to promote competition?

Answer: The Joint Board and the Commission can use universal service support for schools, libraries and health care providers to further competition by adopting EDLINC's proposal. A universal service mechanism that allows providers to win the right to serve particular school or library districts (or larger aggregations of users) to provide any services or functionalities the user may require will encourage the growth of small service providers and undercut existing monopolies.

For example, by allowing a user to solicit bids from any interested service provider to fulfill a particular function, and further guaranteeing the winning

bidder steady cash flow and a profit through the combination of the user's payments and the universal service fund payments, low cost providers will be encouraged to submit the lowest possible bids. In many cases -- such as in the use of wireless technology to avoid asbestos removal costs or to reach remote areas -- alternative providers may be able to serve a school or library user more cost effectively than incumbent local exchange carriers. If this proves to be the case, those alternative providers will have gained a foothold in a particular geographic region, from which they may be able to expand by serving other, noneducational users. Thus, our proposal offers the dual benefit of providing competition to incumbent carriers and encouraging the growth of small carriers and alternative technologies.

Therefore, universal service support should be structured to permit all potential users to solicit bids from as many interested providers as possible, with a minimum of administrative obstacles. In addition, universal service support should be available to any entity that has been awarded a contract to deliver a covered service to an eligible user.

10. Should the resale prohibition in Section 254(h)(3) be construed to prohibit only the resale of services to the public for profit, and should it be construed so as to permit end-user cost based fees for services? Would construction in this manner facilitate community networks and/or aggregation of purchasing power?

Answer: The resale prohibition should only apply to resale for profit, and should permit end-user cost-based fees for services. By interpreting the prohibition narrowly, the Commission would further support and encourage the development and proliferation of community and civic cooperatives by allowing the aggregation of purchasing power. The comments filed by the Lincoln Trail Libraries System describe a typical library cooperative, as found in several states:

- Lincoln Trail Libraries System is a state-sponsored organization serving the libraries of 116 members in East Central Illinois. Academic, public, school, and special libraries participate as members. Lincoln Trail member facilities are spread over approximately 250 buildings in a nine-county area. This area is largely rural. The median population served for participating school districts is 795, and the median size for participating public libraries is 3,042. The median budget of all participating libraries

is \$54,000, with some annual budgets falling below \$10,000 per year.¹⁰

This type of consortium -- which should, of course, include private schools -- allows individual entities to broaden and expand the services they offer to the public.

Furthermore, the rules regarding resale should distinguish between the telecommunication facilities and services offered using those facilities. In its earlier comments, the Washington State Library suggested that:

[T]he FCC should seriously consider separating the telecommunications mechanisms that make an electronically based service possible (the tool) from the service itself (the product) in applying the 'no resale' prohibition. For instance, a library may not resell its discounted access to its city government, but it may levy a fee for Internet classes, or setting up and maintaining an Internet account through the library, or for maintaining a web site for its unit of local government. Such an application would appear to satisfy the intent of the Telecommunications Act, but this distinction would be more easily known and understood by all concerned if the FCC clarifies it.¹¹

11. If the answer to the first question in number 10 is "yes," should the discounts be available only for the traffic or network usage attributable to the educational entities that qualify for the Section 254 discounts?

Answer: One of the primary goals of the Act is to ensure that educational institutions and libraries have access to affordable telecommunications services. We believe that

¹⁰ Comments of Lincoln Trail Libraries System in *CC Docket No. 96-45*, April 5, 1996, at p.1.

¹¹ Comments of Washington State Library in *CC Docket No. 96-45*, at p. 17.